

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

2008 JUN 24 PM 1:30

UNITED STATES OF AMERICA
vs.
Esmeralda Heredia GALLEGOS

Magistrate's Case No. 08 MJ 1942
COMPLAINT FOR VIOLATION OF
21 U.S.C. 952 and 960
Unlawful Importation of a Controlled Substance

The undersigned complainant being duly sworn states:

COUNT ONE

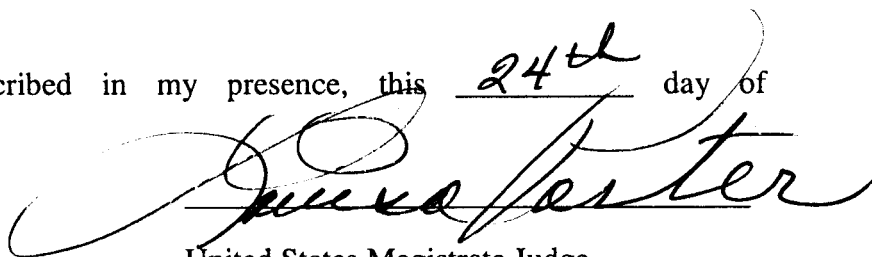
That on or about June 23, 2008, within the Southern District of California, defendant Esmeralda Heredia GALLEGOS did knowingly and intentionally import approximately 20.85 kilograms of methamphetamine, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



Signature of Complainant
Special Agent
U.S. Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence, this 24th day of June, 2008.



United States Magistrate Judge

1
2 United States of America
3 VS.
4 Esmeralda GALLEGOS

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6 STATEMENT OF FACTS

7 On June 23, 2008, at approximately 3:38 pm, Esmeralda GALLEGOS was waiting in
8 lane number 13 to apply for admission into the United States from Mexico at the San Ysidro Port
9 of Entry (POE), San Diego, CA. Customs and Border Protection (CBP) Officer E. Ongsioco
10 encountered GALLEGOS as he was conducting pre-primary roving operations at the San Ysidro
11 POE. GALLEGOS was the driver and sole occupant of a burgundy 2001 Jeep Wrangler bearing
12 California license plate 5PGX089. Officer Ongsioco reported that GALLEGOS said she had
13 travelled from Victorville, CA today to go to a doctor's appointment in Tijuana, Mexico.
14 GALLEGOS stated that she was the registered owner of the vehicle, and that she had purchased
15 it approximately six months ago.
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17 Officer Ongsioco reported that he observed that GALLEGOS was acting nervous, was
18 avoiding eye contact, had abnormally pale skin tone in her face, and had shaky hands. Officer
19 Ongsioco conducted a cursory inspection of GALLEGOS' vehicle and observed a non-factory
20 compartment built underneath the floorboard. Officer Ongsioco requested the assistance of CBP
21 Officer E. Drivdahl to screen the vehicle with his narcotics detector dog. Officer Drivdahl's
22 narcotics detector dog alerted to the presence of a narcotic odor near the rear of GALLEGOS'
23 vehicle. GALLEGOS and her vehicle were referred to the secondary lot for an intensive
24 inspection.
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27 CBP Officer L. Hua was assigned to conduct the secondary inspection of GALLEGOS'
28 vehicle. Officer Hua discovered a non-factory compartment in the floorboard of the vehicle.

1 Officer Hua gained access to the compartment and observed packages consistent with narcotics
2 packaging. Officer Hua probed a random package revealing a white-crystalline substance that
3 field-tested positive for amphetamines. Officer Hua removed a total of 20 packages of
4 methamphetamine from GALLEGOS' vehicle with an aggregate weight of 20.85 kilograms.
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